SMETA
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Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit details

Site details

Sedex site reference	ZS1000041774	**Site name**	Zhejiang Autumnwell Leatherware Co Ltd
Business name	Zhejiang Autumnwell Leatherware Co Ltd	**Site address**	Factory Building No.1,Langzhen Industrial Zone, Anhua Town, Zhuji city, Zhejiang Province.China 中国浙江省诸暨市安华镇朗臻创业园1号厂房 诸暨市安华镇 CN 311821

Audit details

Sedex company reference	ZC5000035688	**Auditor company name**	BUREAU VERITAS CPS - ASIA
Audit company address	7th Floor. Octa Tower. 8 Lam Chak Street, Kowloon Bay, Kowloon, HONG KONG, CN, -		
Date of audit	2026-04-30	**Audit conducted by**	Michael Ma
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		
Time in and out	Day 1 In 07:55 Out 15:30		

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Findings →

Audit type	Periodic
Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Zhang Liangying / Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no labor union in the factory.		
Reason for absence during the audit	There was no labor union in the factory.		
Reason for absence at the closing meeting	There was no labor union in the factory.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	The semi-announced window of this audit was 4 weeks from April 20, 2026 to May 19, 2026.

Lead auditor	Michael Ma	**APSCA Number**	21701157
Additional auditor	Joe Ye	**APSCA Number**	21700735
Date of declaration	2026-04-30		

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Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Zhang Liangying
Title	Manager
Date of declaration	2026-04-30

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Findings →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC ZAF601420532
	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601420531
	3.N Ensure that all hazardous substances (e.g...	Local law	NC ZAF601420529
	3.O Implement an appropriate electrical safet...	Local law	NC ZAF601420530
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law Base code	NC ZAF601406788
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601406789

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Management systems →

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	Robust management systems	Some improvements recommended	Some improvements recommended	Robust management systems
1.A. Responsible recruitment and entitlement to work	Robust management systems	Robust management systems	Some improvements recommended	Some improvements recommended
2. Freedom of association and right to collective bargaining are respected	Robust management systems	Robust management systems	Robust management systems	Robust management systems
3. Working conditions are safe and hygienic	Robust management systems	Some improvements recommended	Robust management systems	Fundamental improvements required
4. Child labour shall not be used	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems
5. Legal wages are paid	Some improvements recommended	Robust management systems	Some improvements recommended	Fundamental improvements required
6. Working hours are not excessive	Some improvements recommended	Fundamental improvements required	Some improvements recommended	Fundamental improvements required
7. No discrimination is practiced	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems
8. Regular employment is provided	Robust management systems	Some improvements recommended	Some improvements recommended	Robust management systems

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	Robust management systems	Some improvements recommended	Some improvements recommended	Robust management systems
9. No harsh or inhumane treatment is allowed	Robust management systems	Some improvements recommended	Robust management systems	Robust management systems
10.A. Environment 2-Pillar	Robust management systems	Robust management systems	Some improvements recommended	Fundamental improvements required
10.C. Business ethics	Robust management systems	Robust management systems	Robust management systems	Robust management systems

- Not addressed
- Fundamental improvements required
- Some improvements recommended
- Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC5000035688	
Sedex site reference	ZS1000041774	
Company name	Zhejiang Autumnwell Leatherware Co Ltd	
Business ownership type	GOODS	
Site name	Zhejiang Autumnwell Leatherware Co Ltd	
Site name in local language	浙江登维皮具有限公司	
GPS location	**GPS address**	Factory Building No. 1, Langzhen Industrial Zone, Anhua Town, Zhuji City, Zhejiang Province, China
	Coordinates	Latitude: 29°32′57″ N Longitude: 120°7′42″ E
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Mr. Yang Jianjun
	Job title	General manager
	Phone number	18967956116
	Email	sales@autumnwell.com

← Management systems

Worker analysis →

Company and site details

Applicable business and other legally required business license numbers and documents	Business license No.: 91330681MA2BG7CQ67 Valid from February 3, 2010 to February 2, 2060 Fire license license number No.: 诸建消 2020 No: 0171 Valid Date: Long-term Building structure document license No.: 诸建 311***1101 Valid Date: Long-term Safety production management certificate No.: 431***62X valid from November, 15, 2023 to November 14, 2026

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of luggage, handbags and the like, saddlery and harness
	Secondary	
	Other	
Product type	Wallets, Belts Activities: Cutting, Sewing, Edge Painting, Assembly, Inspecting and Packing	
Process overview	Products: Wallets, Belts Activities: Cutting, Sewing, Edge Painting, Assembly, Inspecting and Packing 2 Production Lines main equipment: Cutting Machines and Sewing Machines	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	6800m²

← Site details
Worker analysis →

Site scope

Building 1	**Last construction works on site**	2021
	If building is shared, provide details	No shared building
	Number of floors	5
	Description of floor activities	1F: Cutting, Warehouse Interlayer between 1F to 2F: Office 2F: Sewing, Assembly, Inspecting, Packing 3F: Sewing, Assembly, Inspecting, Packing 4F: Edge Painting, Cutting 5F: Warehouse
Building 2	**Last construction works on site**	2021
	If building is shared, provide details	No shared building
	Number of floors	4
	Description of floor activities	1F: Canteen, Kitchen, Office 2F-4F: Dormitory
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

← Site details

Worker analysis →

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	Yes
Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional
Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	All All accommodations in site included in this audit.
Does the site organise worker transport to the worksite?	Not applicable The site did not provide worker transport to the worksite. It was not required by law.

Work patterns

Approximate workers on site per month (% of peak)	**January**	90-100%	**February**	90-100%
	March	90-100%	**April**	90-100%
	May	90-100%	**June**	90-100%
	July	90-100%	**August**	90-100%
	September	90-100%	**October**	90-100%
	November	90-100%	**December**	90-100%
Is there any night shift work at the site?	No			

← Site details   Worker analysis →

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes The site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No Human Rights Impact Assessment (HRIA) was not conducted by the factory.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	8	*(57.1%)*	6	*(42.9%)*	-	-	14	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	8	*(57.1%)*	6	*(42.9%)*	-	-	14	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	8	*(57.1%)*	6	*(42.9%)*	-	-	14	*(100%)*
International migrant workers	-	-	-	-	-	-	0	*(0%)*
Total migrant workers	8	*(57.1%)*	6	*(42.9%)*	-	-	14	*(100%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Hunan, Guizhou, Sichuan province

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	0	-	0	-	-	-	0	*(0%)*
15 - 17 years old	0	-	0	-	-	-	0	*(0%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	Per management interview, the peak season period was not obvious.
Please list the nationalities of all workers, with the three most common nationalities listed first	Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	57%	43%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 *(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 *(0%)*
Workers paid hourly / daily rate	8 *(57.1%)*	6 *(42.9%)*	- -	14 *(100%)*
Salaried workers	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	*(0%)*
Paid weekly	0	-	0	-	-	-	0	*(0%)*
Paid monthly	8	*(57.1%)*	6	*(42.9%)*	-	-	14	*(100%)*
Other	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

If other payment cycle entered, please provide details	All workers were paid monthly. No other payment cycle in factory.

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	1	*(50%)*	1	*(50%)*	-	-	2
Supervisors or team leaders	0	-	0	-	-	-	0
Administrative staff	0	-	0	-	-	-	0

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 group of 5
Did workers understand the purpose of the audit?	No
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis

Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No concerns or complaints raised by workers.
What did the workers like the most about working at this site?	Accommodation standards Contracts Pay
Additional comments	During the opening meeting, auditor explained to the factory representatives that the audit was to develop the partnership between the client and suppliers, scope of audit and the audit standard were also explained. After the opening meeting, factory tour, document review, interviews with management members and workers were conducted as scheduled in the audit programs, a full audit was finished under the co-operation of the factory representative. During the closing meeting, the auditor provided the factory representative a general overview and then explained the strengths, weaknesses and findings in factory. Also, auditor left a copy of filled & signed SMETA Corrective Action Plan Report to factory. The factory representatives agreed with all the findings and promised to make corrective actions as soon as possible. Remark: Apart from the 10 workers interviewed listed in the worker analysis table, another 2 employees were interviewed for business ethics and 2 employees for environment as this is a 4-pillar audit.
Attitude of workers' committee/union representatives	Attitude of the worker representatives were favorable. They opened and comfortable to express her views. They were satisfied with the factory in regard to the facilities provided to them, payments and the management's behavior.

Attitude of workers

Attitude of managers	At the opening meeting, auditor explained the audit scope and the audit standard to the factory representatives. Factory tour, document review, interviews with management members and workers were conducted as scheduled in the audit programs, a full audit was finished under the co-operation of the factory representatives. At the end of the audit, auditor had a closing meeting with factory representatives and all findings were discussed. Factory management signed the CAP and was given a copy.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	3	2	-	5
Workers interviewed individually	2	3	-	5

← Worker analysis
Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	5	5	-	10
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	5	5	-	10

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.2%	1.3%	-	2.5%
Last full calendar year (2025)	1.5%	1.2%	-	2.7%
Previous full calendar year (2024)	1.5%	1.6%	-	3.1%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?	Yes Accidents were recorded by the factory.

← Worker interviews

Code area 0 →

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

← Measuring workplace impact

Code area 0 →

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Measuring workplace impact
Code area 1 →

Systems and evidence examined to validate this code section	1. Mr. Li Hougao / Office director was assigned to be responsible for the whole CSR system. 2. The site established a system and policy to deliver compliance to the code. 3. The site provided the ETI code to its supplier. 4. The site communicated ETI Code to all employees. 5. The site established policy and procedure of No Forced Labour. 6. The workers were free to terminate their employment without restriction. 7. There was no evidence to show that the site withheld the workers' payment and related certificates. The workers were free from fees or debt associated with recruitment. The site didn't hire any prisoner workers or homeworkers. 8. Site was opened and transparent, with no bribery behavior during audit. 9. Site representatives were cooperative and attended the opening meeting and closing meeting. 10. All relevant documents were provided for review. All site areas were open for assessment. 11. Site management also provided a private area for employee interviewing. 12. Site management were acting in an ethical and transparent way during the audit process. 13. No integrity issue noted during the audit. 14. Site had established a policy to communicate with suppliers about CSR standards. 15. CSR policy was posted on board for all employees. 16. Human rights policy was established and posted on board. 17. CSR related training including human rights were provided for employees. 18. The semi-announced window of this audit was 4 weeks from April 20, 2026 to May 19, 2026. Evidence examined: Site policy on No Forced Labour; Employees' contacts; Employee handbook; Personal files with ID copies; Onsite observation; Resign records and payroll records; Human rights policy; Management and worker interview.

← Measuring workplace impact

Code area 1 →

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has formulated written policies and procedures regarding Forced Labour, which outlines the key mechanisms for preventing forced labour. This procedure includes content of freedom of employment, resignation, overtime, and movement, for example, workers could be freely resignation after communication with management in advance 30 days notification. The site regularly reviews and updates of these policies and procedures, which are signed by the top management, and posts them on the employees' noticeboard. The procedure also included the elements about human trafficking, debt bondage/bonded labour and other form of modern slavery. Resources: There is a designated individual responsible for ensuring the implementation of the site policies. Nevertheless, there is a lack of regular training to guarantee that the management meets the requisite standards. Communication & Training: The site had developed an annual training plan, trained workers according to the plan and the training records were provided for review, however, they had evaluated the effectiveness of employee training, but some interviewed workers were not clear about the detailed requirement. Also, there is no documented process in place to ensure that all new starters receive the training in a timely manner. Monitoring: The site provides worker with grievance mechanisms e.g. suggestion boxes to receive feedback on their work, and records of grievance are kept. Also, the site continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Based on the internal audit results, no negative evidence on forced, bonded or involuntary prison labours were identified. The site has not used third parties to hire workers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	1. The site did not require deposit or withhold employees' ID cards. 2. The site did not restrict the employees' freedom. 3. There was no forced labour, bonded labour or involuntary prison labour. 4. Employees were free to leave their employer after reasonable notice. 5. Policy concerning freely chosen employment was established in the site. 6. Communication of freely chosen employment was conducted through training and policy posted for employees. 7. Site policy, communication records and other relevant documents were provided and checked. 8. The workers sign labour contracts with the site and were communicated about their employment terms, working conditions and job responsibilities before starting to work at the site. Details: 1. Site certifications. 2. Appointment letters. 3. Communication records with employees, suppliers and other relatives. 4. Employee interview and management interview.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1

Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has established written policies and procedures regarding recruitment, the procedures include recruiting process and responsibilities of personnel responsible for recruitment, such as providing complete information to applicants during recruitment. The site has formulated Employees Manual to outline the nature of work, location, working conditions including working time, living conditions and costs, employment terms, wages and benefits, etc. The employees manual is available for all types of workers. The policy is establish including provisions within service agreements that hold labour providers or on-site subcontractors contractually responsible to ensure no recruitment fees or related costs are incurred or charged to workers and specifies the responsible party for reimbursing workers accordingly if they incur fees or costs. Resources: Based on the procedures, there is a designated individual responsible for ensuring the implementation of the site policies. The designated staff is responsible for the policies' approval and regular review and implement the recruitment procedures, such as accurately communicating terms of employment to workers during recruitment and reviewing workers' original ID card and cannot charge any recruitment fee. Communication & Training: Training at site is specifically managed by the training manager. The recruitment policies are available and communicated to all workers. Training on the recruitment policies is mandatory for all HR staff processing applications or onboarding. However, the training does not cover the requirement of recruitment fee. Monitoring: Responsibilities for monitoring implementation of legitimate right to work are defined by the Recruitment Procedure. The procedure requires that this verification is conducted by the HR Manager. The site retains records such as ID copy in workers' personnel records to evidence that workers that they employ have the legal right to work. HR manager regularly checks the authenticity and legality of workers' materials to effectively protect workers' rights. The site does not use labour providers/on-site subcontractors. Therefore, the site does not have adequate system in place to monitor or have such checks.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 1

Code area 2 →

No findings

Systems and evidence examined to validate this code section	1. The site established policy of No Forced Labour; the contents were in line with ETI codes and local law’s requirement. 2. Local law requirements were trained to workers; workers were free to sign labour contracts with the site. 3. There was no forced, boned or involuntary prison labour identified, which was confirmed with workers interview and onsite observation. 4. According to interview with workers and management, overtime was voluntary, and workers could choose to work overtime or not freely. 5. No money or certificate was withheld by site management, they were free to move in workshops, and workers had the right to resign from the site without punishment and deductions. 6. Workers were not being restricted in terms of the movement area in the workshop, and they were free to leave the site after working hours. 7. According to the site's recruitment advertisements, recruitment procedures and interviews with employees, there are no fees that employees need to pay during the site's recruitment process. All recruitment expenses were paid by the site. 8. All workers were hired by the site directly. No non-employee worker was noted. No labor providers or recruitment partners were used. No on-site subcontractors were noted. 9. No recruitment fees or related costs were noted. Evidence examined: Hiring and termination policy; Personal files; Labour contracts; Payroll records; Onsite observation; Workers interview and management interview.

← Code area 1 Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No

← Code area 1.A

Code area 2 →

Percentage of workers that are migrant	100%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Hunan, Guizhou, Sichuan Province

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid?	No - all new workers were recruited locally by the site
Select 1 to 3 sending countries/regions of new workers. Record fees and costs in the following tables.	China

New workers totals

	China
Number of workers	2

Recruitment fees

	China
Payments made in exchange for work	-
Recruitment services which are not optional	-

← Code area 1.A
Code area 2 →

Recruitment fees

Other or uncategorised	-

Related costs

	China
Medical costs	-
Insurance costs	-
Skills and qualification tests	-
Training and orientation	-
Equipment costs	-
Travel costs	-
Accommodation costs	-
Administrative costs	-
Other or uncategorised	-

Illegitimate costs

	China
Payments made to illegitimate actors involved in the recruitment process	-

← Code area 1.A

Code area 2 →

Illegitimate costs

Payments made to illegitimate actors during the course of employment	-
Other or uncategorised	-

Was any worker in this group in debt as a result of these costs?

	China
Yes - to a recruiter	-
Yes - to the audited site	-
Yes - to a third party	-
No - could not verify	✓

Highest total costs incurred

	China
Currency	CNY
Highest total costs incurred	0.0

Additional comments No recruitment fee was found.

← Code area 1.A
Code area 2 →

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has formulated written policies and procedures about freedom of association and the right to collective bargaining, including the worker and union representative election process and requirements. The procedures recognize workers' rights to freedom of association and the right to collective bargaining. The site posts them on the employees' noticeboard to inform workers of their right to join or form an independent trade union or worker committee, and their rights to collective bargaining. Resources: Based on the procedures, there is a designated individual responsible for ensuring the implementation of the site policies. The designated staff is responsible for the policies' approval and regular review and is clear about specific operational responsibilities for implementing the procedures, such as encouraging workers to select worker and union representatives. Communication & Training: The site provides relevant training to all workers and the training covers the content of workers' right to join or form a trade union, and their rights to collective bargaining. And the procedures about freedom of association and the right to collective bargaining are available and communicated to all workers. Through interviewed, the workers are encouraged by the site to join or form a worker committee and union. There is one worker committee at site and there is general awareness of existence of worker committees, their functions and their representatives amongst staff interviewed. The site also provides training for worker representatives, through worker representative's interviewed, they know the committee duties such as meeting with their members and supporting actions needed to take forward the membership's requests. Monitoring: The election records including ballot record of worker representative are kept and provided for review which show that the worker representatives are freely elected. The site provides worker committees and representatives with a safe and unmonitored space to conduct their work when needed. Meeting between committees and the site are conducted once every three months. The meeting notes and the evidence of action taken by management to address concerns reported by workers through the established worker committee are provided for review.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 1.A

Code area 3 →

No findings

Systems and evidence examined to validate this code section	1. The site established a policy on freedom of association. 2. The site did not prohibit workers from establishing a trade union or worker committee, and there was a worker committee in the site. 3. Worker representatives were freely elected in the site by workers; regular meetings were conducted between worker, worker representatives and site managements, the suggestions raised from workers were negotiated by worker representatives and site management. 4. Worker representatives were free to communicate with workers, and they were free to move in all workshops. 5. Workers were free to express their suggestions and grievances to worker representatives and supervisors. 6. There was no collective bargaining agreement in the site, but workers were not restricted to conclude the agreement. 7. The site also provided a suggestion box for workers to raise grievance or suggestions privately. Evidence examined: Site policy on freedom of association and worker representatives election policy; Worker meeting records; Worker representatives election records; Worker interview; Suggestion records; Management interview and employee interview; Onsite observation.

← Code area 1.A
Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	Yes, worker committee
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes

← Code area 2

Code area 3 →

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	Policies & Procedures: The facility has established health and safety policies and procedures, including but not limited to risk assessment, building safety, fire safety, electrical safety, machinery, equipment safety, occupational hazards, personal protective equipment, emergency procedures, chemical management, internal audits, and management reviews. Legal construction safety documents are provided for review. The site conducted fire drills were conducted twice per year. Resources: The site has appointed a senior manager to be overall responsible for the facility's social responsibility management control. An organizational structure has been established with appropriate resources and authorities, and the Environmental, Health and Safety (EHS) responsible person is designated in the site. The appointment letter clearly defines the responsibilities of the responsible persons, and the social responsibility representative is responsible for implementing and supervising the execution of this policy. However, the person in charge EHS is not aware of all EHS requirements. Communication & Training: The social responsibility representative and EHS responsible person conduct annual health and safety training for all employees based on the annual training plan and incorporate the health and safety policies and procedures into the new employee onboarding training. The relevant training records have been maintained. There are no gaps in the training provided to the health and safety responsible persons. Monitoring: The facility conducts an internal audit and management review annually, and the site's senior manager and social responsibility representative oversee the implementation of the health and safety procedures. However, they have not conducted root cause analysis of identified issues. The monitoring work cannot ensure the effective and continuous management of the regulatory requirements and needs to be fundamentally improved.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 2

Code area 4 →

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC	ZAF601420532
	3.M Ensure all machinery is installed, mainta...	Local law	NC	ZAF601420531
	3.N Ensure that all hazardous substances (e.g...	Local law	NC	ZAF601420529
	3.O Implement an appropriate electrical safet...	Local law	NC	ZAF601420530

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	General conditions: 1. The site was well ventilated, no cracks on wall or floor. 2. The site maintained a comfortable temperature throughout work floors, fans were installed. 3. Drinkable water and clean toilet available at no cost in workshops. Fire safety 1. Sufficient fire safety equipment was equipped in workshops. There were fire evacuation maps posted across the factory areas. The fire exits were free of obstructions, and installed with exit signs. The fire equipment was inspected and maintained regularly. 2. Fire drill records and health and safety trainings were provided for review. Audit site fire drill conducted twice per year in ESH regulation. Recent fire drills were conducted on August 15, 2025, and January 12, 2026 i dormitory and workshop. Medical care, PPEs and other aspects 1. First aid kits with sufficient supply was provided for the workers free of charge. 2. The workers were provided with PPEs, PPEs were used in the factory. 3. Health safety related certifications and reports were maintained and provided. 4. Legal construction safety document was provided for review. 5. Regular H&S training was provided for the workers to enhance the workers' awareness of health and safety. 6. The site properly stores the wastes in different designated areas. 7. There was sufficient firefighting equipment installed, which was regularly inspected and maintained. The workers were also trained on fire safety. 8. There were procedures and policies in the site to ensure the health and safety of the workers. The site conducts the risk assessment regularly to ensure the safe working environment for the workers. 9. The site appoint personnel to be responsible for the health and safe operation in the site. Details: 1. Health and safety policy and procedure review. 2. Health and safety training records and fire drill records. 3. Inspection records including machine, electricity device and fire-fighting equipment. 4. Health and safety reports. 5. Worker interview and management interview

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601420532

Non-compliance

Due 2026-06-10

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Description

工厂生产车间产生有毒有害物质，对员工存在潜在的职业病危害，但工厂没有组织这些员工进行职业病体检。
It was noted that the hazardous materials generated from production workshops, which might cause occupational diseases to employees. However, the factory did not provide regular occupational health checks to employees.

Corrective and preventative actions

建议工厂给在生产车间接触有毒有害物质的员工提供定期体检。
It is recommended that management adopt practices and controls to ensure that regular occupational health checks are provided to all employees handling hazardous materials.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

根据《中华人民共和国职业病防治法》第35条：从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。职业健康检查费用由用人单位承担。
用人单位不得安排未经上岗前职业健康检查的劳动者从事接触职业病危害的作业；不得安排有职业禁忌的劳动者从事其所禁忌的作业；对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者，应当调离原工作岗位，并妥善安置；对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。
职业健康检查应当由取得《医疗机构执业许可证》的医疗卫生机构承担。卫生行政部门应当加强对职业健康检查工作的规范管理，具体管理办法由国务院卫生行政部门制定。
In accordance with Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases, for the laborers that are engaged in the operations contacting the harm of occupational diseases, the employing work unit shall organize the occupational health examination of the laborers before they take the posts, when they are at the posts and when they leave the posts, the employing work unit shall inform the laborers of the examination results. The employing work unit shall afford the expenses needed for the occupational health examination.
The employing work unit may not assign the laborers that haven't gone through the pre-post occupational health examination to undertake the operations involving the harm of occupational diseases; may not assign the laborers that have occupational contraindications to undertake the operations that they shall avoid; the laborers that are found to have the health injuries related to their posts during the occupational health examination shall be transferred from their former posts and be settled appropriately; and the employing work unit may not cancel or terminate the labor contacts signed with the laborers that haven't gone through the occupational health examination before they leave their posts.
The occupational health examination shall be undertaken by the medical health institutions which have obtained Practicing License of Medical Institution. Administrative Departments of Health should strengthen the regulation on occupational health checks. Specific administrative measures are established by Health Administration Department of the State Council.

* PDF generated at 07:19 (UTC) on 11 May 2026. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601420531

Non-compliance

Due 2026-06-10

Code area	Status
3 Working conditions are safe and hygienic	Open*

← Code area 3

Code area 4 →

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

工厂缝纫车间2台缝纫机没有安装皮带保护罩。
It was noted that 2 sewing machines in the sewing workshop were not equipped with pulley guards.

Corrective and preventative actions

建议工厂为所有的机器设备都安装保护装置。
It is recommended that management adopt practices and controls to ensure that all machines are equipped with protective guards.

Local law reference

根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。
In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.

Evidence

No Pulley Guard.JPG

* PDF generated at 07:19 (UTC) on 11 May 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

ZAF601420529

Non-compliance

Due 2026-06-10

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.N Ensure that all hazardous substances (e.g. chemicals and pesticides) are officially registered where possible, Material Safety Data Sheets are used, and they are managed appropriately at all times in line with registration and safety instructions, including storage, use and disposal.

Issue title

233 - Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

Description

工厂生产车间80%的化学品容器没有张贴安全标签或者内容标签。
It was noted that 80% chemicals' containers in the workshops were not posed with safety labels or content labels.

Corrective and preventative actions

建议所有在工厂内储存和使用的化学品都有张贴安全标签和内容标签，标签的内容要完整。
It is recommended that management adopt practices and controls to ensure that all the chemicals stored or being used in the factory are posted with safety labels or content labels.

Local law reference

根据《工作场所安全使用化学品规定》第14条：(1)使用单位购进的化学品需要转移或分装到其他容器时，应标明其内容。对于危险化学品，在转移或分装后的容器上应贴安全标签；(2)盛装危险化学品的容器在未净化处理前，不得更换原安全标签。
In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed.

Evidence

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

No Safety Label.JPG

No Content Label.JPG

* PDF generated at 07:19 (UTC) on 11 May 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601420530

Non-compliance

Due 2026-06-10

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Issue title

227 - Unmarked/incorrect labels/signage/instructions for electrics

Description

工厂4楼皮带车间1个电箱没有张贴警告标示。
It was noted that there was no warning sign posted on 1 electric box in the belt workshop on the 4th floor.

Corrective and preventative actions

建议工厂对整个工厂的电器设备安装警示标志。
It is recommended that management adopt practices and controls to ensure that all electric equipment in the factory are marked to avoid electric shock.

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

根据《安全标志及使用导则(GB 2894-2008)》警示标志2-7，当心触电警示标志应安装在有可能发生触点危险的电器设备和线路，如：配电室、开关等。
6.2 标志牌的材质：安全标志牌应采用坚固耐用的材料制作，一般不宜使用遇水变形、变质或易燃的材料。有触电危险的作业场所应使用绝缘材料。
In accordance with Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, the electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen.
6.2 The material of signs: Safety signs should be made of durable material. The materials which will be deformed or deteriorated when wet and flammable material are generally shall preferably not be used. The insulation material should be used at workplace where there is risk of electric shock.

Evidence

No Warning Sign.JPG

* PDF generated at 07:19 (UTC) on 11 May 2026. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Disinfector was used for sterilization and disinfection. related training was provide for workers.
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite) Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No type of modification was found.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3

Code area 4 →

Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	Policies & Procedures: The position of the site is clearly stated in the Child Labour Prevention and Remediation Policy which meets all Workplace Requirements in this code area. The Policy outlines the key mechanisms in place for preventing using child labour and the placement of young workers in dangerous or unhealthy positions. This procedure covers all types of workers including third party employed workers. The Remediation Procedure outlines the procedures and responsibilities for remedying child labour. The procedure defines actions that will be taken, stakeholders that will be engaged and remediation timeframes. Resources: The HR department is named within the Child Labour Prevention and Remediation Policy as ultimately responsible for ensuring its resourcing, approval and regular review. The designated director is clear about the specific operational responsibilities for implementing the procedures, such as the process of age verification and record maintenance. Communication & Training: Training is assigned to training manager. The Child Labour Prevention and Remediation Policy is available and communicated to all workers, however there is low awareness of it amongst staff interviewed, for example, all interviewed workers clearly knew the legal age and they all met the legal age when they joined the site, but several workers didn't know the relevant requirement about young workers. Monitoring: Responsibilities for monitoring implementation of age-verification are defined by the Hiring Procedure. The procedure requires that the age verification is conducted by the HR leads. The site keeps the copy of ID card of workers and age verification records are consistently maintained.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	1. The site established a policy that the factory will never employ or use any child labor under the age of 16 years old. 2. The site will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. 3. Sufficient numbers of employees' personal files were provided for review. 4. Youngest employee was 28 years old. 5. No young-looking employees noted on site. 6. Remedial measures for child labor had been established, once child labor is detected, immediate and strict actions will be taken to remedy the situation in accordance with the procedures and applicable laws. Factory would stop employment of the child labour immediately, inform the guardian, send the child to a safe place. Details: 1. Child protection and juvenile protection policy 2. Training concerning child protection and hiring management 3. Name list, employment contracts and personnel files 4. Management interview and worker interview 5. Factory tour 6. Child labor remediation procedure.

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	28
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	No

← Code area 4

Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has established a policy and procedures for compensation and benefits, which detail the regulations for compensation management, such as ensuring the basic wage is not lower than the local legal minimum wage, overtime pay calculations at 150%, 200%, and 300% of the basic wage for regular days, rest days, and statutory holidays respectively, provisions for rest and leave, standby pay, payroll settlement cycle, method, and payment dates, as well as provisions for final wages upon termination. However, the procedures do not include regulations for employee social insurance. Since the procedure content is incomplete, it reduces the likelihood of long-term and consistent compliance with workplace requirements, so some improvement is recommended. Resources: The factory has appointed a senior manager to be overall responsible for the facility's compensation and benefits management, and an organizational structure has been established with appropriate resources and authorities. The appointment letter clearly defines the responsibilities of each organizational role, and HR Manager is responsible for implementing and supervising the execution of employee work hours, rest and leave, as well as approving compensation. Communication & Training: Management provides annual compensation training for all employees, and the compensation management policy and procedures are included in the new employee onboarding training. The relevant training records have been maintained. However, the training content does not cover social insurance and related topics, which reduces the likelihood of long-term and consistent compliance with workplace requirements, so some improvement is recommended. Monitoring: The facility conducts an internal audit and management review annually, and the factory's social responsibility representative oversees the implementation of the compensation procedures. They identified issues and completed corrective and preventive actions, but factory did not have conducted root cause analysis. The monitoring cannot ensure the effective continuous management of the regulatory requirements, so fundamental improvement is recommended.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 4

Code area 5.A →

5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law Base code	NC	ZAF601406788

Systems and evidence examined to validate this code section	1. All employees were paid no less than CNY 22.99 per hour in sampled month, which was higher than local standard of CNY 2430 per month or CNY 13.97 per hour since January 1, 2026. 2. All sample workers were paid 150% and 200% of regular wages for their weekday and weekend overtime. No holiday overtime was noted. 3.The site used an electronic system for time keeping. Employees were provided with pay slip monthly. 4. Per payroll registers and employees & management were paid on or before end of next month. The wage counting period was from 1st to 31st of last month. 6. The site calculated a living wage based on local expenditures such as medical care, food, and house renting, and measures whether employees reach the living wage. Wage gap analysis was conducted. If the living wage is not reached, employees' salary levels will be increased according to the plan. 7. Partial employees were provided with social insurance. Details: 1. Wage records. 2. Benefits evidence including social insurance, annual leave and other paid leave. 3. Wage and benefits policy and training. 4. Employee interview and management interview.

← Code area 4 Code area 5.A →

Findings: non-compliances

ZAF601406788

Non-compliance

Due 2024-09-24

Code area

5 Legal wages are paid

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Description

工厂的社会保险覆盖不足。工厂2026年3月共有16名员工，包括2名退休的员工；因此14名员工应该参加社会保险。根据工厂提供的2026年3月社会保险缴费单据显示：工厂仅为其中5名员工提供养老、医疗、失业、生育和工伤保险。工厂又为全部员工提供了商业保险（有效期为2025年5月19日-2026年5月18日）。

It was noted that the factory's social insurance coverage was insufficient. There were 16 employees in total in Mar 2026, including 2 retired employees; thus, 14 employees were eligible to participate in the social insurances program. According to the social insurance payment receipt of Mar 2026 provided by factory management, 5 out of 14 employees were provided with pension insurance, medical insurance, unemployment insurance, maternity insurance and industrial injury insurance. And the factory provided commercial insurance to all employees (with expiration dates from May 19, 2025-May 18, 2026).

Description (carried over)

It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt provided by factory management, it was noted that only 4 out of 23 employees were provided with pension, unemployment, medical, maternity insurance, and accident insurances in June 2024. Remark: Factory provided commercial insurance for the other 18 employees valid from(2024.4.15- 2025.4.14)
审核员发现工厂的社会保险覆盖不足。根据厂方提供的 2024年6月社会保险缴费单据显示工厂仅为4/23名员工 提供了失业、养老、医疗、生育和工伤保险。 备注：工厂为其他18名员工提供了商业险（2024.4.15- 2025.4.14）

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 5

Code area 5.A →

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements.
建议工厂为员工提供所有法定的社会保险福利。

Corrective and preventative actions (carried over)

It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements.
建议工厂为员工提供所有法定的社会保险福利。

Local law reference

Legal Requirement: In accordance with Article 73 of the Labor Law of the People’s Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount. In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium.
根据《中华人民共和国劳动法》第73条：劳动者在下列 情形下，依法享受社会保险待遇：(一)退休；(二)患病、 负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育 。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享 受社会保险待遇的条件和标准由法律、法规规定。劳动 者享受的社会保险金必须按时足额支付。 根据《中华人 民共和国社会保险法》第33条，职工应当参加工伤保险 ，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费 。

Evidence

Social Insurance.JPG

← Code area 5 Code area 5.A →

* PDF generated at 07:19 (UTC) on 11 May 2026. View this finding on the Sedex platform for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages meet a living wage Wages are based on job skills and experience The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Not Applicable

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly
Is actual wage data available on site for any of these options?	Monthly

← Code area 5 Code area 5.A →

Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	40.0
	Required hours per month	Non applicable
Maximum legal overtime hours	**Max hours per day**	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	50.0
Minimum legal wage	**Min per hour**	13.97
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2430.0
Actual minimum wage	**Actual per hour**	22.99
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	4000.0

← Code area 5
Code area 5.A →

Minimum legal overtime wage	**Min per hour**	20.96
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	34.49
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	The auditors selected 10 samples in May 2025, 10 samples in December 2025, 10 samples in February 2026 (the most recent pay period) for wage and working hour verification.
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning above minimum wage.
Are there any bonus schemes used?	No

← Code area 5   Code area 5.A →

Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	1. The site calculated employees' wage, which included child care, housing, food, transport, energy consumption, medical care, education, clothing and the like, and all employees were paid beyond the living wage. 2. The factory had established a living wage investigation and calculation procedure. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards; The factory had calculated the industry benchmark standards and living wage requirement based on employees' basic need survey. And compared with the review of workers' total pay including benefits and the credible "living wage" to calculate a "living wage gap" and understand what proportion of the workforce has a gap. Based on the investigation and survey result, the factory total paid wages were higher than the living wages. Details: 1. Wage records. 2. Benefits evidence including social insurance, annual leave and other paid leave; 3. Wage and benefits policy and training; 4. Employee interview and management interview; 5. Living wage calculation records; 6. Wage improvement plan.

← Code area 5

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	Policies & Procedures: The working hour policy was clearly mentioned in the "Employee Handbook". As per the policy, the normal working hours were 8 hours per day and 40 hours per week. Overtime work would be arranged when there was production need. The policy included all legal requirements but did not include the ETI requirement such as the max total working hours per week were 60 hours, although the max total working hours per week did not exceed 60 hours in the factory. Verified through management interview and worker interview, there was no Collective Bargaining Agreement in the site. Resources: The "Employee Handbook" did not assign responsibilities, process in place and address the Code Area 6 (Working Hours Are Not Excessive). HR Manager was assigned responsibility for implementation according to management interview. However, HR was not aware of responsibility and clearly knew all the requirements of ETI such as total working hours should be under 60 hours per week, although total working hours did not exceed 60 hours per week. Communication & Training: The workers received training including working hour policy from Admin Department, but the manager and supervisor were not trained on the working hour policy. Monitoring: The number of overtime hours is monitored by the HR department. There is a mechanism in the electronic attendance and payroll system for monitoring the number of overtime hours and cost of overtime compensation. The HR department can easily access the data of overtime hours of workers. However, the gap in monitoring led to the NC. It was observed that partial workers worked overtime in excess of legal limit. The factory should strengthen the monitoring and control the overtime hours within legal limit, and in the long term, improve the productivity, well-being of the workers and operation of the factory.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601406789

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	1. The site provided all workers' attendance records from March 2025 to audit day for review. Auditors randomly selected each 10 samples from May 2025, December 2025 and February 2026 for working hour and wage assessment. It was noted that the maximum overtime worked on weekdays were 2 hours, the maximum weekly working hours were 52 hours. The maximum monthly overtime hours were 50 hours among testing periods and the longest consecutive working day were 6 days. 2. The site used an electronic system for time keeping. 3. All employees ran one shift from 08:00 to 17:00 with 1 hours' break from 12:00 to 13:00. 4. The site had established working hour and leave management policy, the content was in line with local law's requirement, regular training was provided for workers. 5. Interviewed workers indicated that they were satisfied with the working hours and could refuse overtime work without punishment. They were free to take leaves when necessary. Paid statutory holidays were provided, such as local festival leaves and annual leaves. Details: 1. Working hour records. 2. Working hour policy and training records. 3. Employee interview and management interview. 4. Cross checked production records.

← Code area 5.A

Code area 7 →

Findings: non-compliances

ZAF601406789

Non-compliance

Due 2024-09-24

Code area

6 Working hours are not excessive

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Description

抽样30名工人的工资考勤记录（2025年5月，2025年12月和2026年2月每月10人）进行测试，其中20名抽样工人月加班时间超过法定36小时/月：2025年5月10人为50小时和2025年12月10人为48小时。
Auditors randomly selected 30 workers’ payroll and attendance records (10 from each month of May 2025, Dec 2025 and Feb 2026) for testing and noted that 20 out of all samples worked in excess of the statutory overtime hour limits of 36 hours/month: 10 in May 2025 were 50 hours and 10 in Dec 2025 were 48 hours.

Description (carried over)

It was noted that 30 out of 30 sample population employees worked in excess of the statutory overtime hour limits. A review of 30 sample population time records (10 samples from September 2023, 10 samples from December 2023, 10 samples from the most recent paid month May 2024) yielded the following: •10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 48 hours) in September 2023, which was not in compliance with the legal requirement; •10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 50 hours) in December 2023, which was not in compliance with the legal requirement; •10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 50 hours) in May 2024, which was not in compliance with the legal requirement.
根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。 审核员从厂方提供的工资记录中工抽取 30个样本(其中从随机月2023年9月抽取10个，从随机月 2023年12月抽取10个，从最近月2024年5月抽取10个)，发现共有30名员工加班时间超出了法定标准，具体为： •10/10名员工在2023年9月的加班时间为48小时，超 过每月加班时间不能超过36小时的法律规定； •10/10名 员工在2023年12月的加班时间为50小时，超过每月加班时 间不能超过36小时的法律规定； •10/10名 员工在2024年5月的加班时间为50小时，超过每月加班时间不能超过36小时的法律规定。

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 6

Code area 7 →

Corrective and preventative actions

Recommended Corrective Action: It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits.
建议工厂确保员工的加班时间符合法律要求。

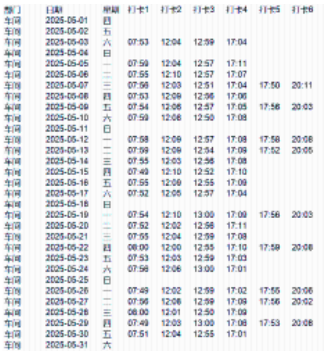
Corrective and preventative actions (carried over)

Recommended Corrective Action: It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits.
建议工厂确保员工的加班时间符合法律要求。

Local law reference

Legal Requirement: In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.
根据《中华人民共和国劳动法》第41条：用人单位由于 生产经营需要，经与工会和劳动者协商后可以延长工作 时间，一般每日不得超过一小时；因特殊原因需要延长 工作时间的，在保障劳动者身体健康的条件下延长工作 时间每日不得超过三小时，但是每月不得超过三十六小 时。

Evidence



部门	日期	星期	打卡1	打卡2	打卡3	打卡4	打卡5	打卡6
车间	2025-05-01	四						
车间	2025-05-02	五						
车间	2025-05-03	六	07:53	12:04	12:59	17:04		
车间	2025-05-04	日						
车间	2025-05-05	一	07:59	12:04	12:57	17:11		
车间	2025-05-06	二	07:55	12:10	12:57	17:07		
车间	2025-05-07	三	07:56	12:03	12:51	17:04	17:50	20:11
车间	2025-05-08	四	07:53	12:09	12:56	17:06		
车间	2025-05-09	五	07:54	12:06	12:57	17:05	17:56	20:03
车间	2025-05-10	六	07:59	12:06	12:50	17:08		
车间	2025-05-11	日						
车间	2025-05-12	一	07:58	12:09	12:57	17:08	17:58	20:08
车间	2025-05-13	二	07:59	12:09	12:54	17:09	17:52	20:05
车间	2025-05-14	三	07:55	12:03	12:56	17:08		
车间	2025-05-15	四	07:49	12:10	12:52	17:10		
车间	2025-05-16	五	07:55	12:09	12:55	17:09		
车间	2025-05-17	六	07:52	12:05	12:57	17:04		
车间	2025-05-18	日						
车间	2025-05-19	一	07:54	12:10	13:00	17:09	17:56	20:03
车间	2025-05-20	二	07:52	12:02	12:56	17:11		
车间	2025-05-21	三	07:55	12:04	12:59	17:08		
车间	2025-05-22	四	08:00	12:00	12:55	17:10	17:59	20:08
车间	2025-05-23	五	07:53	12:03	12:59	17:03		
车间	2025-05-24	六	07:56	12:06	13:00	17:01		
车间	2025-05-25	日						
车间	2025-05-26	一	07:49	12:02	12:59	17:02	17:55	20:06
车间	2025-05-27	二	07:56	12:08	12:59	17:09	17:56	20:02
车间	2025-05-28	三	08:00	12:01	12:50	17:09		
车间	2025-05-29	四	07:49	12:03	13:00	17:08	17:53	20:08
车间	2025-05-30	五	07:51	12:04	12:55	17:01		
车间	2025-05-31	六						

Attendance Records.png

* PDF generated at 07:19 (UTC) on 11 May 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 6

Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	All employees were paid 150% and 200% of regular working wage for overtime working on regular days, rest days respectively, no overtime on statutory holiday was noted.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	51.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	52.0
Maximum number of days worked without a day off in sample	6

← Code area 6 Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has established policies and procedures regarding discrimination, including approach regarding recruitment, training, development and promotion processes, system on wages and transparency in remuneration, etc. Also, the implementation, clearly assigned responsibilities, and processes are formulated in the policy. Resources: The senior director is responsible for ensuring its resourcing, approval and regular review. HR is allocated responsibility to implement the Procedures, which includes all areas, to ensure that employment policies and processes are sufficient to prevent discrimination at all stages of employment. Communication & Training: The latest policy is available and communicated to all workers. The site provides internal training for all workers, but some interviewed workers were not clear about the detailed requirement, they just said that they had not encountered any cases of discrimination, all requirements were fair for them. The site also provides training to personnel responsible for recruitment, training, development, and promotion. Monitoring: Based on procedures, the site ensures that grievance mechanisms such as suggestion boxes and telephone hotlines are accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, and political affiliation. The site continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Based on audit results, no grievances case involving discrimination was reported according to the record.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	1. The site established non-discrimination policy, local law requirements were collected. The site policy contents were communicated to all workers. 2. Based on management interview and workers interview, all workers were recruited only based on working skills and abilities. 3. According to documents review, workers interview and site tour, there was no discrimination on hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation or political affiliation. 4. Workers said they had not encountered any discrimination case before, they were free to express their grievances for any discrimination case. 5. The site also established a grievance procedure, for any discrimination issue; workers were free to express grievance to worker representative and site management. 6. According to the site's inclusion policy, employees will not be treated differently during the recruitment, training, development, and promotion processes due to their gender, beliefs, or whether they are from local or other places. From the time employees enter the site until salary and promotion, it was only related to their skills or abilities. Meanwhile, the site had clear promotion channels for employees' career development plans and also provides relevant training support to meet employees' needs for improvement and training. 7. The site had a dedicated equity approach in recruitment, training, development and promotion processes. The employees did not report any unfair cases. For example: Promotions and salary increases for factory employees were based solely on their skills and professional qualifications, with no relation to gender, race, or other such factors. Workers were paid the same rate in the same workshop, they had equal opportunity for overtime, training and salary raising. Female workers were paid at the same rate as male workers when the job complexity and skills were similar. Evidence examined: The hiring and termination procedure; Non-discrimination policy; Leave application records; Payrolls and attendance records to check the wage and overtime hours; Training records; Grievance records; Employee interview; Onsite observation.

← Code area 6

Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	16%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Chinese

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has established procedures and policies regarding on employment, including the requirements of employment of agency workers, the requirements of labour contracts, etc. The main relevant requirements of the code area, documents clearly assigned responsibilities and processes are detailed in the policy. The site regularly reviews and updates of these policies and procedures and posts it on the employees' noticeboard. Resources: HR Manager is assigned to review and update the policies and procedures. HR Manager is only clear about some information of the operational responsibilities, such as communicating the contractual terms prior to recruitment, but doesn’t know the requirements of using of apprenticeships, temporary, irregular, subcontracted or non-employment models of labour. Communication & Training: The site provides training to all types of workers and the training records are kept. The training content includes the contractual terms, the interviewed workers also confirmed they signed the labour contract and got a copy, but some of them couldn't say the duration of the contract or detailed content in the contract. Monitoring: Based on written procedure, internal audits, monitoring of key performance indicators (in particular whether there is excessive use of agency, subcontracted or temporary labour) are carried out annually. Also, the site periodically reviews the contractual terms to identify any unreasonable terms.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 7

Code area 8.A →

Systems and evidence examined to validate this code section	1. The site established a worker recruitment procedure to identify the hiring and management of all migrant workers and contracted workers. 2. The site had signed the labour contracts with all sampled workers, which was confirmed through employee interview. Workers were provided with one labour contract copy, and workers agreed with all contents. No recruitment fee was required by the site. 3. No agent worker or homeworker was used in the site. 4. All workers' ID card copies were kept for review. Evidence examined: Hiring and termination policy; Personal files; Labour contracts; Payroll records; Onsite observation; Workers interview and management interview.

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

← Code area 8

Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8
Code area 9 →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has established procedures and policies regarding on employment, including the requirements of employment of agency workers, the requirements of labour contracts, etc. The main relevant requirements of the code area, documents clearly assigned responsibilities and processes are detailed in the policy. The site regularly reviews and updates of these policies and procedures and posts it on the employees' noticeboard. Resources: HR Manager is assigned to review and update the policies and procedures. HR Manager is only clear about some information of the operational responsibilities, such as communicating the contractual terms prior to recruitment, but doesn’t know the requirements of using of apprenticeships, temporary, irregular, subcontracted or non-employment models of labour. Communication & Training: The site provides training to all types of workers and the training records are kept. The training content includes the contractual terms, the interviewed workers also confirmed they signed the labour contract and got a copy, but some of them couldn't say the duration of the contract or detailed content in the contract. Monitoring: Based on written procedure, internal audits, monitoring of key performance indicators (in particular whether there is excessive use of agency, subcontracted or temporary labour) are carried out annually. Also, the site periodically reviews the contractual terms to identify any unreasonable terms.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	1. Per site tour, document review and management interview, currently no subcontractor was used by the site. 2. There was no homeworking from the site. 3. Policy concerning subcontractor management was established, regulating that if subcontracting needed, site would ask approval from client in advance. 4. The site had established home worker and subcontractor management policy, and site management knew the definition of subcontractor and homeworker. 5. Per factory tour (factory processes), final products were finished in the factory, no home worker was used in the factory. 6. Workers indicated that they had not observed any homeworker. 7. Site warehouse records were checked to verify whether subcontractor was used or not. According to site management interview and onsite observation, no subcontractor was used by the site. Details: 1. Site tour 2. Management interview and employee interview 3. Production record review 4. Sub-contracting not using policy 5. Homeworkers not using policy 6. Warehouse records

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No No home workers used by the supplier.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No As per the workers' capacity and production records, no concerns about unrecorded work or undeclared subcontracting on site.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has declared a policy commitment prohibiting harsh or inhumane treatment, including gender- based violence, endorsed at a senior level, which defines what is covered, and includes any unacceptable behaviors or practices, or the threat of those behaviors, that are intended to, result in, or are likely to result in physical, psychology, sexual or economic harm. Also, the site has established disciplinary policies, which cover the expectations of workers, how performance and behavior is reviewed, and the escalation processes used where needed. The disciplinary processes included punitive measures, such as deductions from wages or enforced additional tasks. The site has established detailed policy and procedure regarding grievance to establish a defined process to address grievances with clear lines of accountability. The policies and procedures cover all workers on site including third party employed workers, and the site regularly reviews and updates of these policies and procedures and posts it on the employees' noticeboard. Resources: site's HR Manager is assigned for implementing the policies and procedures relevant to disciplinary, grievance, harsh and inhumane treatment. The designated staff understands the responsibilities for the behavior and how to recognize and act if harsh and inhumane treatment, punitive measures and grievance are identified. However, the site has not yet appointed another management for interim responsibility of these policies and in the case of position change or absence. Communication & Training: The site has developed an annual training program to communicate and deliver policies and procedures relevant to disciplinary, grievance, harsh and inhumane treatment. All workers at site and the staff in positions of power or authority, such as managers, supervisors, administrative roles such as HR, security guards, etc. have been included in training programs. There is general awareness of the amongst worker interviewed. Monitoring: The site conducts internal audits and risk assessment to identify risks relevant to harsh or inhumane treatment, disciplinary and grievance. The risk assessment includes all types of workers at site. The site has made measure to control risks relate to the risk assessment undertaken, including activities such as developing learning resources and training programs. Besides, records of disciplinary cases are kept.

Summary of findings

← Code area 8.A

Code area 10.A →

Code area	Workplace requirement	Area of NC	Finding

No findings

Systems and evidence examined to validate this code section	1. According to the documentation, the site management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination of employment and the site had developed a training program for all employees on the procedure. 2. Worker interview confirmed that workers were aware of the disciplinary procedure. 3. As per management interview, document review and workers interview, there was a policy on Harsh Treatment. 4. There was an internal process for grievance, where workers can report any grievances. The factory management will conduct discussions and provide responses, with the entire process being formally documented. 5. Per employee interview, no overly harsh or inhumane treatment, verbal abuse, corporal treatment was found. Details: 1. The relevant policy on prevention of harassment and abuse 2. Internal grievance procedure documentation. 3. Training records 4. Management interview and employee interview

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Worker representatives and suggestion box were available.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9
Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 9

Code area 10.B →

Management systems

Explanation for management systems grades	Policies & Procedures: The site has declared environmental management manual, which clarifies the organization's environmental goals and commitments, as well as specific environmental management strategies. The manual is reviewed annually. Resources: Based on the established environment procedure, the ESH manager has been appointed to oversee and implement the environment procedure. EHS committee is established to maintain the site's system and operation. The EHS meeting is conducted once per quarter to raise and solve related concerns on environment. Communication & Training: The site provides environment training for all workers regularly, and the training covers environmental protection, hazardous waste treatment, etc. However, there is low awareness of it amongst staff interviewed, some workers didn’t know the details. Monitoring: Based on the procedure, the site conducts internal audit and risk assessments regarding on environment module. The Production Supervisor is responsible for making measure to solve the risk identified in the risk assessment. Based on internal audit results and during the audit, However, it was noted that factory management was unable to provide the approval document for on-site inspection and acceptance of completed environmental protection facilities for review.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 9

Code area 10.B →

Systems and evidence examined to validate this code section	1. According to the documentation, the site management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination of employment and the site had developed a training program for all employees on the procedure. 2. Worker interview confirmed that workers were aware of the disciplinary procedure. 3. As per management interview, document review and workers interview, there was a policy on Harsh Treatment. 4. There was an internal process for grievance, where workers can report any grievances. The factory management will conduct discussions and provide responses, with the entire process being formally documented. 5. Per employee interview, no overly harsh or inhumane treatment, verbal abuse, corporal treatment was found. Details: 1. The relevant policy on prevention of harassment and abuse 2. Internal grievance procedure documentation. 3. Training records 4. Management interview and employee interview

← Code area 9

Code area 10.B →

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	1. The site provided environmental policy for review. 2. Based on worker's interview, they were trained on environmental protection. 3. The site had tracked necessary data (energy, water, waste, etc.). 4. The site had established targets on energy and waste reduction. 5. Environmental manual was established in the site. 6. Site identifies and monitors potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations. 7. Site had communicated policies and processes, endorsed at the highest level, that includes commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders. 8. Site had established resource-use targets and a plan to reach environment target. 9. Site record energy use, water use, solid waste, material use, hazardous substance uses and waste, and effluent discharge. 10. Site monitor and mitigate the site's impacts on biodiversity. Details: 1. Environmental policy 2. Energy bills and water bill 3. Environmental target 4. Worker and management interview

← Code area 10.A
Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Packaging optimization
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes Factory had an environment policy and risk assessment as well as monitoring report.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs)
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Reduce 3% of the water consumption and electric energy.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The factory checked business partners on the premises were conducting business in line with environmental expectations.

Usage/discharge analysis

← Code area 10.B
Code area 10.C →

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	132,674	124,843
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Nil	Nil
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	235	265
Water discharged	Municipal pipe	Municipal pipe
Water volume discharged (m3)	188	205
Water volume recycled (m3)	0	0
Total waste produced (mt)	12	10

← Code area 10.B

Code area 10.C →

Total hazardous waste produced (mt)	5	5
Waste to recycling (mt)	3	2
Waste to landfill (mt)	0	0
Waste to other (mt)	9	8
Total product produced (mt)	450	430

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies & Procedures: The facility has established written business ethics procedures, which include but are not limited to business competition, corporate opportunities, financial interests, conflicts of interest, principles for dealing with stakeholders, gifts and entertainment, and compliance with laws and regulations. Resources: - HR manager has been appointed as the overall responsible person for business ethics, and a business ethics committee has been established. Communication & Training: An annual training plan has been developed, and HR manager provides annual business ethics training for the members of the business ethics committee, with the training records maintained. the training has been provided to all facility employees, which reduces the likelihood of long-term and consistent compliance with workplace requirements. Monitoring: The facility conducts an internal audit and management review annually; the review report covered the inspection of business ethics.

← Code area 10.B

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	1. The site manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery. 2. Business ethics policy training was provided once a year. 3. Business ethic policy was posted on site and communication channels were also posted. 4. There was an internal grievance process, including suggestion box, mail and telephone. Details: 1. The company business ethics policy including anti bribery and corruption. 2. Training records 3. Site tour 4. Management interview and management interview

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	Nil

← Code area 10.C

Attachments

MSDS.JPG

Factory Name.JPG

PPE.JPG

First Aid Kit.JPG

Testing Eye Washing Facility.JPG

Belt Workshop.JPG

Address.JPG

PPE (Steel Glove).JPG

Finished Product Warehouse.JPG

No Smoking Sign.JPG

Sewing Workshop.JPG

Inspecting Workshop.JPG

Cutting Workshop-2.JPG

Needle Guard.JPG

PPE Signs & Warning Sign for Occupational Hazardous.JPG

Toilet.JPG

Emergency Light, Exit Sign and Fire Alarm.JPG

Pulley Guard.JPG

Warning Sign.JPG

Factory Building.JPG

Canteen & Dormitory Building.JPG

Packing Workshop.JPG

Dorm Interior.JPG

Chemicals Warehouse.JPG

Safety Labels.JPG

Wallet Workshop.JPG

Fire Hydrant and Fire Extinguishers.JPG

Cutting Workshop-1.JPG

[Drinking Place.JPG]

[Content Labels.JPG]

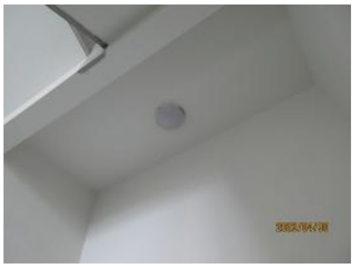
[Canteen.JPG]

[Suggestion Box.JPG]

[Electronic Attendance System.JPG]

[Explosion-Proof Light.JPG]

[Edge Painting Workshop.JPG]



[Emergency Light in the Staircase.JPG]

[Evacuation Plan.JPG]

[10260972212-Zhejiang Yanzhi(Smeta-4)-Image of On Site CAP-Zhejiang Autumnwell Leatherware-Apr 30, 2026.pdf]